

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

JERALD R. JACKSON, Trustee of the  
JERALD R. JACKSON 1975 TRUST, AS  
AMENDED; and IRENE M. WINDHÖLZ  
TRUST DATED AUGUST 11, 1992,

Appellants,

v.

THE STATE OF NEVADA STATE  
ENGINEER; and EDWARD H.  
GROENENDYKE, Trustee of the  
GROENENDYKE FAMILY TRUST,

Respondents.

Supreme Court Case Number: **67289**

Electronically Filed  
Jul 13 2015 11:16 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

**STIPULATION TO EXTEND TIME TO FILE ANSWERING BRIEF**

(First Request)

Appellants, by and through their counsel; and Respondents, by and through their respective counsel, hereby stipulate as follows:

1. That this Court enter an Order granting the State Engineer's Stipulation to Extend Time to File State Engineer's Answering Brief (First Request).

2. That Respondent State Engineer be given up to and including Monday, July 27, 2015, to file his Answering Brief in this matter.

3. Counsel for the State Engineer previously agreed to both the First and Second Requests to Extend Time by Respondent EDWARD H. GROENENDYKE, Trustee of the Groenendyke Family Trust ("Groenendyke").

4. This Stipulation is entered into at the request of counsel for the State Engineer who respectfully represents as follows:

a. That counsel has been working diligently and in good faith to meet the deadline for the filing the Answering Brief;

b. Counsel mistakenly believed that the extension requested by Groenendyke would also apply to the State Engineer's brief and counsel

began working on other matters. The brief is nearly complete, but is not ready to file on July 13, 2015.

5. The basis of this request has been discussed with counsel for Appellants and Respondent Groenendyke, who have no objection to the requested extension of two weeks, up to and including July 27, 2015, within which to file the State Engineer's Answering Brief in this matter.

6. This Stipulation is presented in good faith and not for the purpose of delay.

7. This is the State Engineer's first request for an extension of time to file his Answering Brief.

IT IS SO STIPULATED.

RESPECTFULLY submitted this 13<sup>th</sup> day of July, 2015.

ADAM PAUL LAXALT  
Attorney General

WOODBURN AND WEDGE

By: /S/ Bryan Stockton  
BRYAN STOCKTON  
Senior Deputy Attorney General  
Bar Number 4764  
100 North Carson Street  
Carson City, Nevada 89701

By: /S/ Gordon H. DePaoli  
GORDON H. DEPAOLI, ESQ.  
Bar Number 0195  
6100 Neil Road, Suite 500  
Reno, Nevada 89511

*Attorneys for Respondent  
NEVADA STATE ENGINEER*

*Attorneys for Appellants*

KAEMPFER CROWELL

By: /S/ Severin A. Carlson  
SEVERIN A. CARLSON, ESQ.  
Bar Number 9373  
50 West Liberty Street, Suite 700  
Reno, Nevada 89501

*Attorneys for Respondent  
GROENENDYKE, Trustee of the  
Groenendyke Family Trust*

### **CERTIFICATE OF COMPLIANCE**

I hereby certify that I have read the STIPULATION TO EXTEND TIME TO FILE ANSWERING BRIEF (First Request), and to the best of my knowledge, information and belief, it is not frivolous or interposed for any improper purpose.

I hereby certify that this STIPULATION complies with the type style and typeface requirements NRAP 32(a)(4)-(6) because a proportionally spaced typeface Times New Roman, 14 point was used, the STIPULATION set in a plain, roman style, using underlining, italics and boldface for emphasis and case names, if used, were italicized.

DATED this 13<sup>th</sup> day of July, 2015.

ADAM PAUL LAXALT  
Attorney General

By: /s/ Bryan Stockton  
BRYAN STOCKTON  
Senior Deputy Attorney General

*Attorneys for Respondent*  
*NEVADA STATE ENGINEER*

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I hereby certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on this date I deposited for mailing at Carson City, Nevada, a true and correct copy of the foregoing STIPULATION TO EXTEND TIME TO FILE ANSWERING BRIEF (First Request), addressed to:

SEVERIN A. CARLSON, ESQ.  
50 West Liberty Street, Suite 700  
Reno, Nevada 89501

GORDON H. DEPAOLI, ESQ.  
6100 Neil Road, Suite 500  
Reno, Nevada 89511

DATED this 13<sup>th</sup> day of July, 2015.

/s/ Janice M. Riherd  
JANICE M. RIHERD  
An Employee of the State of Nevada